

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF:

LARADY LIZ RAMOS ORTIZ,

Debtor.

CASE NO. **15-02053 (BKT)**

CHAPTER 13

MOTION FOR LEAVE TO WITHDRAW FROM LEGAL REPRESENTATION

TO THE HONORABLE COURT:

NOW COMES, the undersigned attorney and very respectfully states and prays as follows:

1. The undersigned attorney has represented Debtor in this case since its filing on March 20, 2015.

2. The plan was confirmed by the Court on June 18, 2015 (Dkt. 20) and there is a pending request to dismiss the case filed by the Chapter 13 Trustee (Dkt. 46).

3. Although the plan was modified on November 17, 2015 (Dkt. 26), a modification approved by the Court (Dkt. 29), no fees were collected for such post-confirmation attorney work. The undersigned attorney has not collected any fees from Debtor after plan confirmation and payment of the "No-Look fee" approved by this Honorable Court when the plan was confirmed on June 18, 2015. There is no pending application for compensation.

4. Debtor has informed the undersigned that she wishes to retain new counsel to continue these proceedings and has asked the undersigned attorney to withdraw from the legal representation.

5. Debtor is making the necessary arrangements to appear through new counsel and timely address the issues raised by the Trustee's motion to dismiss by the due deadline of July 1, 2019.

6. The undersigned attorney has transmitted the case file to Debtor.

7. Thus, in light of the aforementioned, Attorney Carlos C. Alsina-Batista respectfully requests this Honorable Court to grant the present request to authorize withdrawal from Debtor's legal representation.

WHEREFORE, the undersigned attorney very respectfully prays from this Honorable Court to take notice of the aforementioned and grant Attorney Carlos C. Alsina-Batista leave to withdraw from Debtor's legal representation.

RESPECTFULLY SUBMITTED.

NOTICE: Within **fourteen (14) days** after service as evidenced by the certification, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of this

filing to the U.S. Trustee, **Chapter 13 Trustee Alejandro Oliveras Rivera**, and all CM/ECF participants, and also mailed the same to any creditors in the attached list that are not CM/ECF participants.

In Corona, California, this 11th day of June, 2019.

/s/ Carlos C. Alsina-Batista

Carlos C. Alsina Batista

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0104-3
Case 15-02053-BKT13
District of Puerto Rico
Old San Juan
Thu Apr 16 19:16:29 AST 2015

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

(d)RELIABLE FINANCIAL SERVICES, INC.
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